

BEN |||| LANGE

FOR

UNITED STATES CONGRESS

606 13th Ave NE | Independence, IA 50644 | 319.327.4325 | info@langeformcongress.com | www.langeformcongress.com

Jeff S. Jordan, Supervisory Attorney
Complaints Examination & Legal Administration

Office of General Council
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

RE: MUR 6409

November 8, 2010

Dear Mr. Jordan,

Lange for Congress ("LFC"), located at 606 13th Ave. NE, Independence, Iowa, received matter MUR 6409 from the Federal Election Commission on November 5, 2010 (postmarked November 2, 2010).

The Iowa Democratic Party and Chairwoman Sue Dvorsky claim LFC "has repeatedly failed to fulfill its duty to fully disclose campaign receipts and expenditures." Ms. Dvorsky also claims LFC "has repeatedly failed to disclose the single largest expenditure" on 3rd quarter and pre-election FEC reports and "failed again to disclose the full expense of Lange's \$66,624 ad buy" ["again" referring to LFC's 10/21 FEC report].

As clarified by the LFC Campaign in a published October 15 press release, "The campaign launched its first television ad on September 30 and received an invoice outlining the expenses on October 1, the first day of the current reporting period. As a result, the expenditure for the television ad will be reflected in the October 21 Pre-General filing in compliance with FEC rules and regulations."

The campaign, as stated in the press release, subsequently disclosed the expenditure in the official FEC October 21 Pre-General filing (for the period covering 10/1/2010 to 10/13/2010) to reflect the expenditure invoiced 10/1/2010. This page of the report is enclosed.

Ms. Dvorsky further claims LFC failed "to disclose the full expense of Lange's \$66,624 ad buy." This conclusion was reached after Ms. Dvorsky compared the FEC report filed 10/21 with "Iowa television stations." Unfortunately, Ms. Dvorsky failed to research the process of media buying and failed to understand the difference between a "net buy" and a "gross buy",

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FEDERAL ELECTION
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OFFICE OF GENERAL
COUNSEL

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leading to her erroneous and misleading claim. The campaign received a commission discount, as outlined within the enclosed invoice, because campaign staff produced the television ad internally.

We have enclosed the invoices to confirm the final amounts billed to LFC and due to the vendor, which are the "full" dollar amounts correctly disclosed within the 10/21 FEC report (please note that the \$60,666.51 FEC disclosure described as "Palm Cards & Media" consists of two separate invoices that were subsequently paid by LFC with one check).

If you have further questions, I can be reached at (319) 361-1645 or via email, at treas@langeforcongress.com.

Sincerely,



Greg R. Torgerson, Treasurer
Lange for Congress

Enclosures:

1. Invoice #10219 (Palm Cards)
2. Invoice #10286 (Media Buy)
3. 10/21 FEC report (select page showing palm card purchase and media buy expenditure filing)

Paid for by Lange for Congress.

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**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**Use separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 36 / 38

<input checked="" type="checkbox"/> 17	<input type="checkbox"/> 18	<input type="checkbox"/> 19a	<input type="checkbox"/> 19b
<input type="checkbox"/> 20a	<input type="checkbox"/> 20b	<input type="checkbox"/> 20c	<input type="checkbox"/> 21

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NAME OF COMMITTEE (in Full)

Lange for Congress

A.

Full Name (Last, First, Middle Initial)

Greg R. Torgerson

Transaction ID: SB17.7348

Date of Disbursement

10 / 06 / 2010

Mailing Address 606 13th Ave. NE

City
IndependenceState
IAZip Code
50644

Amount of Each Disbursement this Period

500.00

Purpose of Disbursement
Payroll Expense001
Category/
TypeCandidate Name
Lange for CongressOffice Sought: ☒ House
Senate
PresidentDisbursement For: 2010
Primary ☒ General
Other (specify) ▼

State: IA District: 01

B.

Full Name (Last, First, Middle Initial)

Greg R. Torgerson

Transaction ID: SB17.7349

Date of Disbursement

10 / 06 / 2010

Mailing Address 606 13th Ave. NE

City
IndependenceState
IAZip Code
50644

Amount of Each Disbursement this Period

31.98

Purpose of Disbursement
Binders - reimbursement001
Category/
TypeCandidate Name
Lange for CongressOffice Sought: ☒ House
Senate
PresidentDisbursement For: 2010
Primary ☒ General
Other (specify) ▼

State: IA District: 01

C.

Full Name (Last, First, Middle Initial)

Victory Enterprises

Transaction ID: SB17.7291

Date of Disbursement

10 / 01 / 2010

Mailing Address 5200 SW 30th St.
Ste. 7City
DavenportState
IAZip Code
52802

Amount of Each Disbursement this Period

60688.61

Purpose of Disbursement
Palm Cards & Media004
Category/
TypeCandidate Name
Lange for CongressOffice Sought: ☒ House
Senate
PresidentDisbursement For: 2010
Primary ☒ General
Other (specify) ▼

State: IA District: 01

SUBTOTAL of Disbursements This Page (optional) ▶

61198.59

TOTAL This Period (last page this line number only) ▶

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